H2/RC/67



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TX 75202-2733

DALLAS, TX 75202-2733

MEMORANDU	M / B////
SUBJECT:	RCRA Compliance Inspection Report
FROM:	Michael T., Michaud, Chief Surveillance Section (6EN-AS)
TO:	Eddie Sierra, Chief Texas Section (6EN-HT)
forwarded	ned RCRA inspection report has been prepared and reviewed by Assurance and Enforcement Division personnel. This report is being to you for your information and action.
EPA ID Num Facility N Facility M	nbe <mark>r:TX1200939626 Inspection Dates:June 9-10, 1998</mark> Jame:Bureau of Engraving and Printing Jailing Address: 9000 Blue Mound Road Fort Worth, TX 76131
Type of Ow Did facili HW Activ Inspection Inspection EPA Inspec State Insp Facility R Checklists X Generate X TSD (26 X Tanks X Containe Landfill Transport	Post Closure
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### Bureau of Engraving and Printing Fort Worth, Texas TX1200939626

### **RCRA Compliance Evaluation Inspection Report**

#### Introduction

A RCRA Compliance Evaluation Inspection was performed as part of a Multimedia Inspection (MMI) at the Bureau of Engraving and Printing (BEP), Western Currency Facility, in Fort Worth, Texas, the week of June 8-12, 1998. The BEP is located at 9000 Blue Mound Road, Fort Worth, TX 76131. After clearing security, entry was made at 10:45 am on Tuesday, June 8, 1998. The EPA inspector for the RCRA portion of the MMI was Kelli A. Smith. The facility representatives included: Robert Hobbs, Facility Manager; Colleen McKinney, Chemical Engineer; and Dennis Stark, Chief Engineer. Following the entrance briefing, all of the inspectors (Air, NPDES, and RCRA) were taken on a site tour of the facility. On the first day of the inspection, RCRA Enforcement Officer Walt Helmick also participated in the inspection.

The BEP is a federal facility under the Department of the Treasury. The Bureau's Western Currency Facility opened on April 26, 1991. The BEP produces currency for the Federal Reserve. The current capacity of the plant allows them to produce 4.5 billion notes per year. In 1996, they produced 4.1 billion notes.

#### **Site Tour**

A general site tour occurred on Tuesday with all of the inspectors; a more detailed site tour occurred on Wednesday with Colleen McKinney; Rick Hill, Safety Specialist; and the RCRA inspector. The inspectors and facility representatives toured the production facility. The facility uses 12 "Intaglio" printers, 6 for the fronts of the bills, and 6 for the backs. The wash water from the presses is fed into a sump and is pumped to the wastewater plant. The inks (both green and the magnetic and non-magnetic black) are kept along the back wall of the production area. Also stored in the production area are small cans (1-2 gallon) of what the facility refers to as "Varsol". Varsol is the name used for the parts cleaners that they use to clean parts of the printers. The waste Varsol is considered a hazardous waste. Attachment C includes the MSDSs for the parts cleaner they are currently using.

The inspectors then went to the Plate Making area. The printing plates are made through a nickel electroforming process. The filters off of the nickel tanks are rinsed, wrapped in plastic, and set out to be taken to the Hazardous Waste Storage area.

The inspectors also visited the Ink Mill. There were several drums scattered around collecting debris of one sort or another. Only one drum was labeled as "hazardous waste". That drum contained D001, Mixed Solvents (petroleum distillates, mineral spirits). This drum was situated next to one of the ink machines, sitting on a drum dolly, with absorbent pigs around the bottom of the drum. Also in this area were two drums, not labeled, with half lids (lids cut in half) used to hold ink debris (dried ink, etc.). Neither drum had any labeling. There was also a drum full of rags. These were used rags with ink, Varsol, etc. on them. This drum did not have a lid or a label. According to BEP staff, the contents of this drum are not being manifested as a hazardous waste although they are contaminated with Varsol. A drum of waste Varsol was also in this area.

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It was half full, had an unsecured lid, and no label. A parts cleaner is also located in this area. The waste Varsol accumulates in a drum underneath. None of these areas where the drums were located were designated as Satellite Accumulation Points (SAP). - do they have to do this

Around the corner from the ink mill was the Liquid Storage area. In this area is a SAP for the Contractors to keep their mixed solvent and waste flammable oils wastes. Foth of these drums were labeled and had secured lids; however, this is not at or near the point of generation of the waste. The contractors generate the waste on the production floor, and then bring it back to this area to collect.

The less than 90 day storage area was visited next. There were two different sections of drums. One of the sections contained 24 drums in a 4x6 arrangement. There was no aisle space to get to the drums in the middle to check for leaks. One drum of waste hydraulic oil had collapsed, and no effort had been made to repackage the drum. The 24 drums consisted of: 8 drums of organic debris; 6 drums of mixed solvents; 2 drums of broken bulbs containing mercury vapor; 7 drums of hydraulic oils; and 1 drum of crushed fluorescent bulbs. The second section of drums were arranged against the wall in a 4x2x2 pattern. There was no way to view the drums against the wall to check for leaks. In this section of 16 drums, 4 were organic debris; and 12 were treatment plant/electroplating waste.

The Roller Making area was also visited. This room is off to the side of the production floor. There is a SAP in the area for D001, Mixed Solvents. They use "Varsol" to clean the rollers. The drum has secondary containment, with a stationery funnel on the top. It was recommended to the staff in this area, to replace the funnel with a bung when the drum is not in use to keep outside people from mixing wastes.

The Cope-Pak area was visited as well. This is a caged area next to the production area. A SAP for D001 Mixed Solvents was in this area. It had secondary containment with an "Ultra Funnel" on the top. This funnel top was not very secure, and this area is unattended to most of the time. Also in this area were two non-hazardous Ink Debris drums that were in the process of being filled. a was admingel

The last area visited was the waste treatment plant. The electroplating sludge is treated and kept separately from the other wastes. There is a SAP within the containment area for the electroplating sludge. Ut was labeled with chemical names nickel hydroxide and chromium hydroxide, and waste codes D004, D005, D006, D007, D008, D009, D010, D011, and F006. Also in this area was a drum full of "debris" with an electroplating sludge hazardous waste sticker. The BEP representative was unsure of how long it had been there. Neither drum was secure. The full drums in this area go an intermediate staging area for a day or two (according to BEP) until a forklift comes by to pick it up. This area is not designated as a less than 90 day storage area. I do they have to label area as SAI

#### Records Review

A records review was conducted on both days of the MMI. Manifests for the last three years were reviewed. The inspectors had some confusion over the waste codes on the manifests matching up to the waste codes on the NOR and BEP's list of wastes and codes. Attached to this report are some of the manifests and BEP's waste codes (Attachments D and E).

The inspector also reviewed current lab results for the inks used in the plant and the waste treatment solids. TCLP and TPH were run on each. TCLP for all of them came back under detection levels; TPHs ranged from 54,300 mg/kg for the treatment plant solids, to 144,000 mg/kg for the non-magnetic ink. All of the inks were above 100,000 mg/kg for TPH. There was also some concern that the flash point for the green ink was 120 deg. F. However, a current and correct MSDS from the manufacturer corrected that concern.

The BEP has no written inspection schedule and no weekly inspection logs for their storage area.

The only training records available were for a few people in the ink mill, the EM shop, and a couple plant engineers. The only records for those people were certificates from an 8 hr. refresher course from June 1997. There is no record of any job specific training.

The BEP has five tanks that are used for emergency spill purposes only. They were empty during the inspection and were not looked at during the site tour. The Tanks checklist was filled out by BEP personnel and sent to the inspector.

Th BEP does not have a waste analysis plan in place.

The BEP has a contingency plan; however the majority of the plan is from 1994 and has not been updated to reflect changes in personnel.

### **Areas of Concern**

- -The SAP for the Contractor's waste is not at or near the point of generation. It is located in a completely separate area of the facility.
- -The SAPs in the Ink Mill are unlabeled. The drums are not labeled and most had unsecured lids.
- -The less than 90 day storage area had a collapsed drum that had not been replaced or fixed. There was also a concern of aisle space to be able to check the rest of the drums for leaks.
- -There was a drum of debris in the electroplating area at the waste treatment plant that was marked with a electroplating sludge hazardous waste sticker and no other information.
- -The drums from the SAP in the electroplating area at the waste treatment plant need to be moved directly to the storage area instead of being placed in a separate area for 1-2 days.
- -Several records were incomplete: there were no inspection logs; no waste analysis plan; and incomplete training records.
- -Some of the waste codes in the NOR and the facility codes are not matching up the waste codes recorded on the manifests.

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## DEPARTMENT OF THE TREASURY IVED BUREAU OF ENGRAVING AND PRINTING

October 16, 1990

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HAZARBOUS TASTE HIGHT, BIV

R.v. 10/19/90 DA. 11-14-90

USEPA Region VI Hazardous Waste Division Mail Stop 6H 1445 Ross Avenue Dallas, Texas 75202



Dear Mr. Sirs:

The Bureau of Engraving & Printing currency manufacturing facility in Fort Worth will maintain a comprehensive environmental program, in compliance with all Federal, State, and local statutes and regulations. The primary contact for all information relating to environmental matter is: TX1200 939626

Mr. Alan B. Crouch Bureau of Engraving & Printing 9000 Blue Mound Road Fort Worth, Texas 76131-3304 817-885-7300

Sincerely,

Deputy Assistant Director (Operations)

Contact crouch Alan-B
phone 817-885-7300

File

Form Approved OMB No 2050-0028 Expires 9-30-88 GSA No 0246-EPA-OI Please print or type with ELITE type (12 cm., acters per incht in the unshaded areas only Please refer to the Instructions for Filing Notification before completing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act). United States Environmental Protection Agency Washington, DC 20460 Notification of Hazardous Waste Activity SEPA For Official Use Only Comments C I. Name of Installation City or Town III. Location of Installation R 0 D υ N М 0 0 0 State City or Town V. Installation Contact Name and Title (last, first, and job title, 0 N R 0 L D т A E R V. Ownership B. Type of Ownership (enter code) Name of Installation's Legal Owner T Ü Y D E ₽ R S US R Е Vi. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.) B. Uged Of Fuel Antivition A. Hazardous Weste Activity 8. Off-Specification Used Oil Fuel N/A (enter 'X' and mark appropriate boxes below) 1b. Less than 1,000 kg/mo. 👿 1s. Generator 2. Transporter a. Generator Marketing to Burner 3, Treater/Storer/Dispose b. Other Merketer 4. Underground Injection 5. Market or Burn Hazardova Wasta Fuel (enter 'X' and mark appropriate boxes below) C. Burner 7. Specification Used Oil Fuel Marketer (or On site Burner)
Who First Claims the Oil Meets the Specification a. Generator Marketing to Burner ☐ b. Other Marketer C. Burner VII. Waste Fuel Burning: Type of Combustion Device (enter 'X' in ell appropriate boxes to indicate type of combustion device(s) in which hazardous wasta fuel or off-specification used oil fuel is burned. See Instructions for definitions of combustion devices.) C. Industrial Furnace B. Industrial Boiler A. Utility Boiler VIII. Mode of Transportation (transporters only — enter "X" in the appropriate box(as) ☐ A. Air ☐ B. Rell ☐ C. Highwey ☐ D. Water ☐ E. Other (specify) IX. First or Subsequent Notification Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below. Installation's EPA ID Number 9 Bubsoquent Notification (complete item C) a A. First Notification EPA Form 8700-12 (Rev. 11-85) Provious edition is obsolete.

Description of Hazardous Wastes (continued from front)  Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous wast from nonspecific sources your installation handles. Use additional sheets if necessary.  The property of the property of the four-digit number from 40 CFR Part 261.31 for each listed hazardous wasteful from 10 0 1 1 1 12  The property of the property of the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from 40 CFR Part 261.33 for each listed hazardous waste from 40 CFR Part 261.33 for each listed hazardous waste from 40 CFR Part 261.33 for each listed hazardous waste from 40 CFR Part 261.33 for each listed hazardous waste from 40 CFR Part 261.33 for each listed hazardous waste from 40 CFR Part 261.33 for each listed hazardous waste from 40 CFR Part 261	1
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EPA Form 8700-12 (Rev. 11-95) Reverse

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# ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act(RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

TX1200939626

US TR DEPT BUREAU OF ENGRAVING & POCOVERT MAROLD ENGR
147H & C STS SM ROOM 124N
HASHINGTON

1000 BLUE MOUND RD
FT WORTH

TX 76131

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Listed Infectious We pitals, or medical and	setes. Enter the four-digit of research laboratories you	number from 40 <i>CFR</i> F ur installation handles	ert 261.34 for each hazen Use additional sheets if n	dous waste from hospita ecessary.	als, veterinary hos-
Listed Infectious Wi pitals, or medical an	setes. Enter the four-digit d research laboratories you	number from 40 CFR in installation handles	Part 261.34 for each hazan Use additional sheets if n	dous waste from hospital ecessary.	ils, veterinary hos-
pitals, or medical and	d research laboratories you	r installation handles	Use additional sheets if h	ecessery.	54 B4
pitals, or medical and	oniisted Hezerdous West	51 51 50 Mark X' in the box	62	63	54
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pitals, or medical and	onlisted Hezerdous Waste dies, (See 40 CFR Ports 25	51 51 50 Mark X' in the box	62	63 63 eracteristics of nonlisted	54
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### DEPARTMENT OF THE TREASURY

BUREAU OF ENGRAVING AND PRINTING WASHINGTON, D.C. 20228 GOH VI

69 APR 24 PH 1: 07 HAZARDOUS WASTE MGMT. DIV.

March 30, 1989

USEPA Region VI Air and Hazardous Material Division 1201 Elm Street Inter-First Two Building Dallas, Texas 75270

Dear Sirs:

Enclosed is a first notification of hazardous waste activity. Please issue the appropriate EPA ID number and forward all correspondence to:

H. Covert, Staff Engineer Room 124M Bureau of Engraving and Printing 14 & C Streets, S.W. Washington, D.C. 20228

Thank you for your cooperation.

Sincerely,

Harold Covert Staff Engineer

CAVEYE PM 124M
DEPARTMENT OF THE TREASURY
BUREAU OF ENGRAVING AND PRINTING
WASHINGTON, D.C. 20228

OFFICIAL BUSINESS PENALTY FOR PRIVATE USE, \$300

1989 The Postage and Postage a

USEPA Region VI Air and Hazardous Material Division 1201 Blm Street Inter-First Two Building Dallas, Texas 75270 

Reviewed by

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TX 75202-2733

MEMORANDUM SUBJECT: RCRA Compliance Inspecti FROM: Michael 1., Michaud, Chief Surveillance Section (6EN-AS) TO: Eddie Sierra, Chief Texas Section (6EN-HT) The attached RCRA inspection report has been prepared and reviewed by Compliance Assurance and Enforcement Division personnel. This report is being forwarded to you for your information and action. EPA ID Number: TX1200939626 Inspection Dates: June 9-10, 1998 Facility Name: Bureau of Engraving and Printing Facility Mailing Address: 9000 Blue Mound Road Fort Worth, TX 76131 Facility Owner: Department of the Treasury Tel: Facility Description: currency production Type of Ownership: X Federal \_\_State \_\_Count Did facility request a copy of the report? X YES County Municipal NO HW Activities: X Generator  $\underline{\hspace{0.2cm}}$  Treatment  $\underline{\hspace{0.2cm}}$  Storage  $\leq$  90d Transporter \_\_Storage \_\_\_Disposal Inspection Type: X Lead \_\_Overview \_\_STARS Commitment X CEI \_\_\_\_PCE \_Land Ban \_\_\_BIF \_\_\_Sampling <u>X\_</u>Multi-Media \_\_Maqiladora Inspection Participants: (name and phone number) EPA Inspector(s): Kelli A. Smith (5-8047), Walt Helmick (5-8373) State Inspector(s): N/A Facility Representative(s): Colleen McKinney (817) 847-3820 Checklists Completed: (Indicate number of each checklist attached) X\_Generator \_\_\_\_Waste Piles \_\_\_Thermal Treatment <u>X</u>TSD (265) \_\_\_Closure \_Chemical, Physical and <u>X</u>Tanks \_\_\_Post Closure Biological Treatment X\_Containers \_\_Incinerator Surface Impoundments \_Landfill \_Land Treatment X Generator Supplement Transporter LOIS Photographs \_\_Land Ban Groundwater X Attachments See narrative. \_BIF \_\_Other Apparent violations noted during outbriefing: See narrative.

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (40% Postconsumer)

### Bureau of Engraving and Printing Fort Worth, Texas TX1200939626

### **RCRA Compliance Evaluation Inspection Report**

#### Introduction

A RCRA Compliance Evaluation Inspection was performed as part of a Multimedia Inspection (MMI) at the Bureau of Engraving and Printing (BEP), Western Currency Facility, in Fort Worth, Texas, the week of June 8-12, 1998. The BEP is located at 9000 Blue Mound Road, Fort Worth, TX 76131. After clearing security, entry was made at 10:45 am on Tuesday, June 8, 1998. The EPA inspector for the RCRA portion of the MMI was Kelli A. Smith. The facility representatives included: Robert Hobbs, Facility Manager; Colleen McKinney, Chemical Engineer; and Dennis Stark, Chief Engineer. Following the entrance briefing, all of the inspectors (Air, NPDES, and RCRA) were taken on a site tour of the facility. On the first day of the inspection, RCRA Enforcement Officer Walt Helmick also participated in the inspection.

The BEP is a federal facility under the Department of the Treasury. The Bureau's Western Currency Facility opened on April 26, 1991. The BEP produces currency for the Federal Reserve. The current capacity of the plant allows them to produce 4.5 billion notes per year. In 1996, they produced 4.1 billion notes.

Site Tour

A general site tour occurred on Tuesday with all of the inspectors; a more detailed site tour occurred on Wednesday with Colleen McKinney; Rick Hill, Safety Specialist; and the RCRA inspector. The inspectors and facility representatives toured the production facility. The facility uses 12 "Intaglio" printers, 6 for the fronts of the bills, and 6 for the backs. The wash water from the presses is fed into a sump and is pumped to the wastewater plant. The inks (both green and the magnetic and non-magnetic black) are kept along the back wall of the production area. Also stored in the production area are small cans (1-2 gallon) of what the facility refers to as "Varsol". Varsol is the name used for the parts cleaners that they use to clean parts of the printers. The waste Varsol is considered a hazardous waste. Attachment C includes the MSDSs for the parts cleaner they are currently using.

The inspectors then went to the Plate Making area. The printing plates are made through a nickel electroforming process. The filters off of the nickel tanks are rinsed, wrapped in plastic, and set out to be taken to the Hazardous Waste Storage area.

The inspectors also visited the Ink Mill. There were several drums scattered around collecting debris of one sort or another. Only one drum was labeled as "hazardous waste". That drum contained D001, Mixed Solvents (petroleum distillates, mineral spirits). This drum was situated next to one of the ink machines, sitting on a drum dolly, with absorbent pigs around the bottom of the drum. Also in this area were two drums, not labeled, with half lids (lids cut in half) used to hold ink debris (dried ink, etc.). Neither drum had any labeling. There was also a drum full of rags. These were used rags with ink, Varsol, etc. on them. This drum did not have a lid or a label. According to BEP staff, the contents of this drum are not being manifested as a hazardous waste although they are contaminated with Varsol. A drum of waste Varsol was also in this area.

It was half full, had an unsecured lid, and no label. A parts cleaner is also located in this area. The waste Varsol accumulates in a drum underneath. None of these areas where the drums were located were designated as Satellite Accumulation Points (SAP).

Around the corner from the ink mill was the Liquid Storage area. In this area is a SAP for the Contractors to keep their mixed solvent and waste flammable oils wastes. Both of these drums were labeled and had secured lids; however, this is not at or near the point of generation of the waste. The contractors generate the waste on the production floor, and then bring it back to this area to collect.

The less than 90 day storage area was visited next. There were two different sections of drums. One of the sections contained 24 drums in a 4x6 arrangement. There was no aisle space to get to the drums in the middle to check for leaks. One drum of waste hydraulic oil had collapsed, and no effort had been made to repackage the drum. The 24 drums consisted of: 8 drums of organic debris; 6 drums of mixed solvents; 2 drums of broken bulbs containing mercury vapor; 7 drums of hydraulic oils; and 1 drum of crushed fluorescent bulbs. The second section of drums were arranged against the wall in a 4x2x2 pattern. There was no way to view the drums against the wall to check for leaks. In this section of 16 drums, 4 were organic debris; and 12 were treatment plant/electroplating waste.

The Roller Making area was also visited. This room is off to the side of the production floor. There is a SAP in the area for D001, Mixed Solvents. They use "Varsol" to clean the rollers. The drum has secondary containment, with a stationery funnel on the top. It was recommended to the staff in this area, to replace the funnel with a bung when the drum is not in use to keep outside people from mixing wastes.

The Cope-Pak area was visited as well. This is a caged area next to the production area. A SAP for D001 Mixed Solvents was in this area. It had secondary containment with an "Ultra Funnel" on the top. This funnel top was not very secure, and this area is unattended to most of the time. Also in this area were two non-hazardous Ink Debris drums that were in the process of being filled.

The last area visited was the waste treatment plant. The electroplating sludge is treated and kept separately from the other wastes. There is a SAP within the containment area for the electroplating sludge. It was labeled with chemical names nickel hydroxide and chromium hydroxide, and waste codes D004, D005, D006, D007, D008, D009, D010, D011, and F006. Also in this area was a drum full of "debris" with an electroplating sludge hazardous waste sticker. The BEP representative was unsure of how long it had been there. Neither drum was secure. The full drums in this area go an intermediate staging area for a day or two (according to BEP) until a forklift comes by to pick it up. This area is not designated as a less than 90 day storage area.

### **Records Review**

A records review was conducted on both days of the MMI. Manifests for the last three years were reviewed. The inspectors had some confusion over the waste codes on the manifests matching up to the waste codes on the NOR and BEP's list of wastes and codes. Attached to this report are some of the manifests and BEP's waste codes (Attachments D and E).

The inspector also reviewed current lab results for the inks used in the plant and the waste treatment solids. TCLP and TPH were run on each. TCLP for all of them came back under detection levels; TPHs ranged from 54,300 mg/kg for the treatment plant solids, to 144,000 mg/kg for the non-magnetic ink. All of the inks were above 100,000 mg/kg for TPH. There was also some concern that the flash point for the green ink was 120 deg. F. However, a current and correct MSDS from the manufacturer corrected that concern.

The BEP has no written inspection schedule and no weekly inspection logs for their storage area.

The only training records available were for a few people in the ink mill, the EM shop, and a couple plant engineers. The only records for those people were certificates from an 8 hr. refresher course from June 1997. There is no record of any job specific training.

The BEP has five tanks that are used for emergency spill purposes only. They were empty during the inspection and were not looked at during the site tour. The Tanks checklist was filled out by BEP personnel and sent to the inspector.

Th BEP does not have a waste analysis plan in place.

The BEP has a contingency plan, however the majority of the plan is from 1994 and has not been updated to reflect changes in personnel.

#### Areas of Concern

- -The SAP for the Contractor's waste is not at or near the point of generation. It is located in a completely separate area of the facility.
- -The SAPs in the Ink Mill are unlabeled. The drums are not labeled and most had unsecured lids.
- -The less than 90 day storage area had a collapsed drum that had not been replaced or fixed. There was also a concern of aisle space to be able to check the rest of the drums for leaks.
- -There was a drum of debris in the electroplating area at the waste treatment plant that was marked with a electroplating sludge hazardous waste sticker and no other information.
- -The drums from the SAP in the electroplating area at the waste treatment plant need to be moved directly to the storage area instead of being placed in a separate area for 1-2 days.
- -Several records were incomplete: there were no inspection logs; no waste analysis plan; and incomplete training records.
- -Some of the waste codes in the NOR and the facility codes are not matching up the waste codes recorded on the manifests.

FACI	LLI	TY NAME:	BEP
EPA	ID	NUMBER:	TX1200939626

# RCRA COMPLIANCE INSPECTION REPORT GENERATORS CHECKLIST

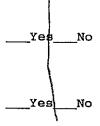
		GENERATORS CHECKLIST	
NOTE:	On n	multiple part questions, circle those not in	compliance.
EPA I	dentif	fication NO. (262.12)	
1.	Does A.	the Generator have an EPA I.D. No.? If yes, what is that number?  TX 1200939626	XyesNo
Hazar	dous M	Vaste Determination (262.11)	
1.	liste	the generator generate hazardous waste(s) ed in Subpart D? (261.30 - 261.33 - List of dous Waste)	No
	a.	If yes, list wastes and quantities on attachment (Include EPA Hazardous Waste Number, waste name and description).	see annual report
2.	exhib appli react	the generator generate solid waste(s) that bit hazardous characteristics? (circle those cable - corrosivity, ignitability, ivity, TC toxicity) (261.20 - 261.24 - acteristics of Hazardous Waste)	X YesNo
	a.	If yes, list wastes and quantities on attachment (Include EPA Hazardous Waste Number, Waste Name and Description.)	see annual report
	b.	Does the generator determine characteristics by testing or by applying knowledge of processes?	
	·	i. If determined by testing, did the generator use test methods in Part 261, Subpart C (or Equivalent)?	YesNo N/A
		ii. If equivalent test were methods used, attach copy of equivalent methods use	,
3.	hazare proces pollu	here any other solid wastes deemed non- dous generated by the generator? (i.e. ss waste streams, collected matter from air tion control equipment, water treatment e, etc.)	YesNo
	a.	If yes, did the generator determine non-hazardous characteristics by testing or knowledge of process?	· · · · · · · · · · · · · · · · · · ·
GENERA	TORS	tested all links 2/2/98	REVISIONMAY 1992

			FACILITI WARE:	
			EPA ID NUMBER:	***************************************
		<b>i.</b>	If determined by testing, did the generator use test methods in Part 261, Subpart C (or Equivalent)?	
		ii.	If equivalent test methods were used, attach copy of equivalent methods used.	
	b.	hazar hazar	wastes and quantities deemed non- rdous or processes from which non- rdous wastes were produced. (Use tive explanations sheet) $\mathcal{W}$	iks stetreatment solid
4.	Are a on-si		tes recycled, reused or reclaimed	Yes_XNo
	andg		e narrative sheet to describe the type by of the waste and the method used ation.	
5.	Are a	ny was	tes shipped off-site for reclamation?	Yes_X_No
	quant	ity of	e narrative to describe the type and the waste and its destination. Also ription of storage prior to shipment.	
6.		e tota ated?	l quantity of hazardous wastes	
	a.		than 100 kg/month?	Yes_X_No
	b.	More	than 1000 kg/month?	XYesNo
	Ç.	More	than 100 but less than 1000 kg/month?	Yes_ <u>X</u> No
Manii	fest			
1.	Does	the ge	nerator ship hazardous waste off-site?	XYes $N$ o
***	a.	If no	, do not fill out Section C and D.	laste Mat-OKC
	b.		es, identify primary off-site ity(s). (Use narrative explanations	remwaste Sulphur, LA Udlaw, Millington, TN
2.			erator shipped hazardous waste off- November 19, 1980?	Yes_No
3.	Is th	e gene	rator exempted from regulation because	
		quant rement	ity generator (261.5 - Special	Yes_X_No
	OR			

FACILITY	NAME:	
EPA ID N	UMBER:	

Produces only non-hazardous solid waste at this time (261.4 - Exclusions)

- If the generator is exempted as a small quantity 4. generator are the following requirements met?
- a. The waste is reclaimed under a contractual agreement in which:
- Yes
- i. The type of waste and frequency of shipments specified in the agreement?
- ii. The vehicles used to transport the waste to the recycling facility and to deliver regenerated material back to the generator is owned and operated by the reclaimer of the waste?
- The generator maintains a copy of the b. reclamation agreement in his files for a period of at least three years after termination or expiration of the agreement?



### Required Information (262.21)

- 5. If not exempted does the generator use manifest?
- If yes, does manifest include the following a. information (262.21 - Required information)

(Circle those not on manifest)

Manifest Document No.

Xyes\_No See examples

- ii. Generators Name, Mailing Address, Tele. No.
- iii. Generator EPA I.D. No.
- Transporter(s) Name and EPA I.D. No. iv.
- Facility Name, Address and EPA I.D. v. No.
- vi. DOT description of the waste
- vii. Quantity (weight or volume) a.
  - Containers (type and number)
- viii. Emergency Information (optional) (Special handling instructions, Phone No.)

			EPA ID NUMBER:		
		ix.	Waste minimization certification	. "	
		-X *	Is the following certification on each manifest form?	XYesNo	
			This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.		
Jses (	of the	Manif	est (263.23)		
5.	Does	the ge	nerator retain copies of manifests?	No	
	how m	any ma	leted manifests at random. Indicate nifests were inspected, how many were noted and the type of violation.)		
	conta		plete a through e. If questions e than one item, circle those not in		
	a.	i.	Did the generator sign and date all manifests inspected?	X_YesNo	
		ii.	Who signed for the generator?  Name: RICK HILL OF COLLEN MCKINNEL  Title:  I.D. Number	I	
	b.	i.	Did the generator obtain handwritten signature and date of acceptance from initial transporter?	No	
		ii.	Who signed for the transporter?  Name:		
	C.	manif	the generator retain one copy of est signed by generator and porter?	X Yes No	
	d.	facil	turned copies of manifest include ity owner/operator signature and date ceptance?	No	
	e.	retur file	py of manifest from facility was not ned within 45 days, did the generator an exception report? 42 - Exception reporting)	YesNo	N/A

FACILITY NAME:\_

		FACILITY NAME:_	
		EPA ID NUMBER:_	
		es, did it contain the following rmation:	. /
		Legible copy of manifest	yesno N/A
	AND		
		Cover letter explaining generators efforts to locate waste.	YesNo
	f. Does (will 3 years?	) the generator retain copies for	No
Pre-I	ransport Requirem	ents	
1.	Does the generat	or package waste?	YesNo
	If no, skip to q If yes, complete	uestion 9. the following questions.	
		rs ready for immediate shipment. such containers, skip to question 8	•
2.		or package waste in accordance 178, and 179? (DOT requirements) ing)	No
3.	Are containers to or bulging?	o be shipped leaking, corroding	Yes_XNo
	Use narrative exponential containers and containers	planations sheet to describe ondition.	I was collapsed
4.	in accordance wi	or use DOT labeling requirements th 49 CFR 172 when containers are ment? (262.31 - Labeling)	No
5.		or mark each package in accordance when containers are offered for 2 - Marking)	XYesNo
6.	marked with	ntainer of 110 gallons or less h the following label when are offered for shipment?	XyesNo
	Disposal. If for	- Federal Law Prohibits Improper und, contact the nearest police authority or the U.S. otection Agency.	
	Generator's Name	and Address	
	Manifest Document	Number	
	b. If other 1	abels exist, list in narrative.	

GENERATORS

			EPA ID N	UMBER:	· · · · · · · · · · · · · · · · · · ·	
7.	or un prese	loading nce of	e any vehicles present on site log hazardous waste, inspect for placards. Note this instance or planation sheet.	~		
8.	Satel	lite Ac	cumulation (effective June 20, 1	L985)		
	a.	contai	the generator accumulate waste in ners at or near "Satellite" ation points?		YesNo	
			skip to question 9. $C01$	ntractor	SAP no Genera X Yes_No	t near
	b.	Are co	ontainers in good condition?	-		·
	c.	Is the	waste compatible with the conta	iners?	XesNo	
	d.	Is was	te transferred from leaking cont erwise managed to control leakac	je? _	YesNo	
	e.	Are co	entainers closed?	<del>-</del>	Yes_XNo	notin ink mill
	f.		ontainers marked with the words dous waste" or identification of ts?	the -	Yes_XNo	not in ink
	g.	quart	ste accumulation exceeded one (1 of acutely hazardous waste (261. gallons of other hazardous waste	33 0 1	Mil 	
		If yes				
			Has the container holding the ex amount been marked with the date excess began accumulating?	cess the	Yes No	N/A
			Have excess amounts remained in satellite accumulation area long than three (3) days?		YesNo	1
9.	Accum Small	ulation Quanti	Time (262.34 - Accumulation Tim ty Generators)	e for		
-	a.		te generated > 100 kg/month, but kg/month?	· -	Yea_X_No	
			, answer rest of question #9. skip to question #10.			
	b.	Is haz 180 da	ardous waste shipped offsite wit ys?	hin -	YesNo	N/A
	c.	Has the	e quantity of waste accumulated xceeded 6000 kilograms?	on- -	YesNo	

FACILITY NAME:\_

		FACILITY NAME:		
		EPA ID NUMBER:		
	d.	Does the generator comply with the requirements of Part 265 Subpart C, Preparedness and Prevention?	YesNo	N/A
10.	Accu	mulation Time (262.34 - Accumulation Time)		(
	a.	Is the site a permitted/interim status storage facility?	Yes_X_No	
		If yes, skip to Section E, and complete and attach the TSD checklist and appropriate supplemental checklists. If no, answer rest of question #8.		
	b.	Is hazardous waste shipped offsite within 90 days?	YesNo	
	c.	Is waste stored in containers or tanks?	$\chi$ YesNo	
	d.	Is the beginning date of accumulation time clearly indicated on each container?	X Yes No	
	e.	Is each container or tank marked with the words "Hazardous Waste"?	X <sub>Yes_No</sub>	
,	f.	Complete and attach the containers/tanks supplemental checklists as appropriate.		
	g.	If the generator accumulates waste on-site for less than 90 days, complete RCRA Generators Checklist Supplement.		
Reco	rdkeep	ing and Report		
1.	for	he generator keeping the following reports a minimum of three (3) years? (262.40 - rdkeeping):		
	a.	Manifests and signed copies from designated facilities?	No	
	b.	Biennial reports (or reports as required by state agencies)	XyesNo	
	c.	Exception Reports	No	
	d.	Test results, where applicable.	XesNo	
2.	Wher	e are records kept (at facility or elsewhere)?		
	<del></del>	un office		
		•		

		FACILITY NAME:		<del></del>
		EPA ID NUMBER:		···
3.	Name:	is in charge of keeping the records?  COLLEN MCKINNEY  CHEMICAL Engineer		
Speci	<u>lal Cor</u>	ndition		
L.	a for	the generator received from or transported to reign source any hazardous waste? .50 - International Shipments)	Yes_X_No	
	If ye	es,		/ ^
	a.	Has a note been filed with the R.A.?	YesNo	N/A
	b.	Is this waste manifested and signed by Foreign Consignee?	YesNo	
	c.	If the generator transported wastes out of the country has he received confirmation of delivered shipment?	YesNo	
	d.	Has the generator filed an annual report (by March 1 of each year) giving the type, quantity, frequency and destination of all exported hazardous waste? (Per HSWA 1984)	YesNo	



FACILITY NAME:	BEP.
	TX1200939626

### {265 SUBPARTS A, B, C, D, E - GENERAL FACILITY REQUIREMENTS}

<u>Subpa</u>	rt B - General Facility Standards (265.10)	
1.	Does the facility have an EPA Identification No.?	X Yes No
	If yes, what is that number? $TX 1200939626$	
بز	If no, explain	
Pami	mod Wahinan (OCF 10)	
	red Notices (265.12)	
2.	<pre>Has : he facility received hazardous waste from a foreign source?</pre>	Yes No Yes No <i>N/A</i>
	If yes, has the Regional Administrator been notified?	$_{-}$ Yes $_{-}$ No $\mathcal{N}/A$
3.	Has the facility received waste from off-site for reuse, recycling or reclamation?	Yes X No
4.	Has the owner/operator obtained detailed chemical and physical analyses of representative samples of all hazardous wastes prior to treating, storing or disposing of those wastes?	X Yes No
	If yes,	
	a. Have the analyses been repeated as processes or operations generating the waste change?	Yes No
	b. (for off-site facilities) Are analyses of hazardous waste received does not match the waste identified on the accompanying manifest?	Yes No N/A
5.	(for off-site facilities) Is each shipment of hazardous waste received at the facility inspected and, if necessary, analyzed to determine if it corresponds to the waste listed on the accompanying manifest?	,
6.	Does the facility have a written waste analysis plan?	YesNo
	If yes, is a copy maintained at the facility?	Yes 💢 No
7.	Does the waste analysis plan include the following:	• •
·.	a. Parameters for which each waste will be analyzed and the rationale for selection of these parameters?	Yes X No
*	b. Test methods used to test for these parameters?	Yes X No
TSD 1	·	REVISIONMAY 1992

			FACILITY NAME:				
		EPA ID NUMBER:					
			ing method used to obtain a sentative sample?	Yes X No			
			ency with which the initital analysis be reviewed or repeated?	Yes X No			
		test v	s, does it include requirements to re- when the process or operation ating the waste has changed?	Yes No N/A			
	e.		off-site facilities) Waste analyses generators have agreed to supply?	Yes No N/A			
	f.	are u	off-site facilities) Procedures which sed to inspect and analyze each ent of hazardous waste received at the ity, including:	Yes No NA			
		i.	Procedures used to determine the identity of each movement of waste?	Yes No			
		ii.	Sampling method used to obtain representative sample of the waste to be identified?	Yes No			
ecur:	ity (26	55.14)	· •				
١.	minimi	ize th ns or	cility provide adequate security to be possibility for unathorized entry of livestock onto the active portions of cy?	X Yes No			
٠		ent th	cribe the situation at the facility, ne facility's exemption under 265.14 (2).				
	If no	t exem	mpt, is security provided through:				
	<b>a.</b>	conti onto	our surveillance system which inuously monitors and controls entry the active portion? (e.g. television coring or guards).	Xes No			
	OR	, i					
	b(i).	surro	ficial or natural barrier completely ounding the active portion? (e.g. fence and cliff)?	Yes No			
		Desci	ribe type of security:				
		C-1					
			•				

		FACILITY NAME:_	
		EPA ID NUMBER:	
	and		
	b(ii).	Means to control entry at all times, through the gates or other entrances to the active portion (attendant, television monitors, locked entrance, controlled roadway access)?	Yes No
		Describe type of security:	
•			
•		Include a drawing indicating any inadequates in the facility's security system.	
	c.	Is a sign with the legend "Danger- Unathorized Personnel Keep Out" posed at the entrance and at other locations in sufficient numbers to be seen from any approach to the active portion?	Yes No
	d.	Is it written in English and legible from at least 25 feet?	Xes No
		NOTE: The sign must be written in any other language predominant in the area surrounding the facility (e.g. In New Mexico and Texas areas bordering Mexico, the sign must also be in Spanish).	
	e.	If an existing sign with a legend other than "Danger-Unathorized Personnel Keep Out", what does that legend say?	·
	•		
			·
•			
Gene	ral Insp	pection Requirements (265.15)	
9.	Does t inspec	he owner/operator maintain a written tion schedule?	Yes X No
	If yes		•
	a.	Does it contain, at a minimum, schedules for inspecting the following:	
		i. Monitoring equipment? (If applicable)	Yes X No

				FACILITY NAME:_	- 111
		•		EPA ID NUMBER:_	<u></u>
		ii.	Safety and emergency eq	quipment?	Yes X No
		iii.	Security devices?		Yes X No
	<b></b>	iv.	Operating and structura (if applicable)	l equipment?	Yes X No
<i>;</i>	b.	follo	the schedule or plan ide wing types of problems turing inspection:	entify the to be looked	
		i.	Malfunction or deterior (e.g. inoperative sump fitting, eroding dike, or tanks, etc.)	pump, leaking	Yes X No
		ii.	Operator error?		Yes X No
		iii.	Discharges? (e.g. leaks from valves joint breaks)	s or pipes	Yes X No
	c.	Is th	e schedule maintained at	the facility?	Yes X No
	d.	Are t	hese inspections conduct	ed?	Yes X No
10.	Does	the ow	ner/operator have an ins	spection log?	Yes 🔀 No
	If ye	s, doe	s it include:		n1/0
	a.	Date	and time of inspection?		Yes No N/+
	b.	Name	of inspector?		Yes No
	c.	Notat	ion of observations?		Yes No
	d.	Date actio	and nature of repairs or n?	remedial	YesNo
		i.	Are there any malfuncti deficiencies noted in t log that remain uncorre (Use narrative explanat	the inspection ected?	
	e.	Are r at th	ecords of the inspection e facility for three (3)	log maintained years?	Yes No
Perso	nnel T	rainin	g (265.16)		
11.			ty personnel successfull f classroom or on-the-jo		Yes 🔀 No
	onl	y tr	aining in place ails of content	e is 8 hr	refresher-
	no	det	ruls of content	of train	inaj
TSD			· ·	`	REVISIONMAY 1992

		EPA ID NUMBER:_	·
a.	Does inst	the training program include ructions in the following:	•
	i.	Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment?	Yes No
	ii.	Key parameters for automatic waste feed cut-off systems? (If applicable)	Yes No
	iii.	Operation of communication or alarm systems?	YesNo
	iv.	Response to fires, explosions and groundwater contamination incidents?	Yes No
٠.	v.	Shutdown of operations?	Yes No
	vi.	General hazardous waste management procedures?	Yes No
b.	Is th in ha	ne program directed by a person trained azardous waste management procedures?	Yes No
c.	Have revie	personnel completed annual training	Yes No
d.	Does follo	the owner/operator maintain the owing documents:	1
	i.	Job title, job description and name of employee for each position at the facility related to hazardous waste management?	Yes _X_No
	ii.	Written description of the type and amount of both introductory and continuing training?	Yes X No
	iii.	training has been completed by facility personnel?	Yes No
equiremen	ts for	Ignitable, Reactive or Incompatible Waste	ies of certificates
	facili	ty handle ignitable or reactive wastes?	Yes No
<b>a.</b>	flame surface elect: ignit:	s, is waste separated and confined from es of ignition or reaction. (open s, smoking, cutting and welding, hot ces, frictional heat) sparks (static, rical or mechanical), spontaneous ion (e.g. from heat producing chemical ions) and radiant heat?	Yes No

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TSD 5 FACILITY NAME:\_\_

		FACILITY NAME:	·
		EPA ID NUMBER:	
	b.	Are smoking and open flame confined to specifically designated locations?	Yes No
	c.	Are "No Smoking" signs posted in hazardous areas where ignitable or reactive wastes are handled?	Yes No
	d.	Is waste handled in a manner which generates extreme heat, pressure, violent reaction, toxic fumes or other dangers to human health or the environment?	
<u>Subpa</u>	art C	- Preparedness and Prevention (265.30	<u>ர</u>
Maint	enance	and Operation of Facility (265.31)	
1.		ere evidence of fire, explosion or mination of the environment?	Yes No
	If yes	s, use narrative explanations sheet to in.	
Requi	red Eq	uipment (265.32)	•
2.	Is the	e facility equipped with the following:	
	a.	Internal communications or alarm system?	Yes No
	b.	Telephone or two-way radio to call emergency response personnel?	<u> </u>
	c.	Portable fire extinguishers, fire control equipment spill control equipment and decontamination equipment?	Yes No
	d.	Water of adequate volume for hoses, sprinklers or water spray system?	X Yes No
		i. Describe source of water	
		:	
		ii. Indicate flow rate and/or pressure and storage capacity, if available.	

		FACILITY NAME:	
		EPA ID NUMBER:	·
Test.	ing and	Maintenance (265.33)	
3.	Is e	quipment tested to assure its proper operation?	YesNo
Acce	ss to (	Communication or Alarm Systems (265.34)	
4.	manag	ersonnel involved in hazardous waste gement have immediate access to an internal or communications device?	Yes No
Requi	ired Ai	sle Space (265.35)	
5.	nobe	ere sufficient aisle space to allow tructed movement of personnel and emergency ment?	Yes No
Arran	gement	s with Local Authorities (265.37)	
7.	chara facil and a perso roads route If no such In th depar	, has the owner/operator attempted to make arrangements? e case that more than one police or fire tment might respond, is there a designated ry authority?	Ff Worth FD does annuals visits to facility  X YEB _ NO  YEB _ NO  YEB _ NO N/A
8.	emerg suppl	Is the fire department a city or volunteer fire department?  the owner/operator have phone numbers of and ments with State emergency response teams, ency response contractors and equipment iers?  hey readily available to the emergency inator?	Yes No
TSD 7			REVISIONMAY 1992

		FACILITY NAME:_	
•	-	EPA ID NUMBER:_	
9.	local hospi waste handl	er/operator arranged to familiarize tals with the properties of hazardous ed and types of injuries that could fires, explosions, or releases at the	Yes No
	If no, has this?	the owner/operator attempted to do	Yes No P
10.	enter into	e, or local authorities decline to the above referenced agreements has ion been entered in the operating	Yes 🔀 No
Subp	art D - Co	ntingency Plan and Emergency Proce	dures (265.50)
Conte	nt of Contin	gency Plan (265.52)	
1.	Does the fa	cility have a contingency plan?	<u> </u>
	a. If ye	s, does it contain:	
	£.	Actions to be taken in response to emergencies?	X Yes No
	ii.	Description of arrangements with police, fire and hospital officials?	Yes No
	iii.	List of names, addresses, phone numbers of persons qualified to act as emergency coordinator?	Yes No
	iv.	List including the location and physical description of all emergency equipment?	Yes X No
	<b>v.</b>	Evacuation plan for facility personnel including signals, primary and alternate routes?	<u></u>
2.	Is the plan	a revised SPCC Plan?	YesNo
Copie	s of Contige	ncy Plan (265.53)	
3.		of the contingency plan maintained at	X Yes No
4.	Has a copy depts., and	been supplied to local police, fire hospitals?	_X Yes No

	FACILITY NAME	E:
	EPA ID NUMBER	<b>:</b>
Amen	ndment of Contingency Plan (265.54)	
5.	Has the contingency plan been updated and amended as necessary?	Yes X No
Emer	gency Coordinator (265.55)	
6.	Is there an emergency coordinator on-site or within short driving distance of the plant at all times?	X Yes No
	If yes, list primary emergency coordinator:	-
<u>Bub</u> j	part E - Manifest System, Recordkeeping and	Reporting (265.70)
	of Manifest (265.71)	
1.	Has facility received hazardous waste from off- site since November 19, 1980?	Yes X No
	If no, questions 2 and 3 are not applicable.	
	If yes, does the facility retain copies of all manifests for at least three (3) years?	Yes No
	a. Are the manifests signed and dated and returned to the generator?	Yes No
	b. Is a signed copy given to the transporter?	YesNo
2.	Has the facility received any hazardous waste from a rail or water (bulk shipment) transporter since November 19, 1980?	m Yes No
	If yes, is it accompanied by a shipping paper?	Yes No
	a. Does the owner/operator sign and date the shipping paper and return a copy to the generator?	Yes No
	b. Is a signed copy given to the transporter?	Yes No
Manif	Fest Discrepancies (265.72)	
3.	Has the facility received any shipments of hazardous waste since November 19, 1980, which were inconsistent with the manifest?	Yes No N/A

			FACILITY NAME:		
			EPA ID NUMBER:		
	If yes	s, has ator an	he resolved the discrepancy with the discrepancy with the		Yes No
		, has R iting?	degional Administrator been notified		Yes No
Opera	ting R	ecord (	265.73)		
4.					Yes X No
•	a.	Is a c	copy maintained at the facility?		Yев 🔀 No
	b.	Does t	he record include:		
		i.	Description and quantity of each hazardous waste and the methods and dates of its treatment, storage or disposal at the facility?		Yes X No
		ii.	Location and quantity of each hazardous waste at each location?		Yes No
		iii.	(for disposal facilities only) Location and quantity of each hazardous waste recorded on a map or diagram of each cell or disposal area?		Yes No
		iv.	Record and results of waste analyses?		Yes No
		<b>v.</b>	Reports of incidents involving implementation of the contingency plan? (If applicable)		Yes No
		vi.	Records and results of required inspections?	ė.	Yes No
		vii.	Monitoring, testing or analytical data where required?		Yes No
		viii.	Closure cost estimates and for disposal facilities, post-closure cost estimates?		Yes No
Avail	abilit	y, Rete	ention, and Disposition of Records (265.74)	L	•
5.	Have and/o	all pla r been	ans and reports been visually inspected made available for inspection?	X	Yes No

FACILITI NAME:	
EPA ID NUMBER:	
List plans and/or reports not made available for inspection. If reports are accessible and not made available or inspection, explain.	
Did operator provide inspector with a drawing of the facility?	Yes No
a. If yes, please indicate which are hazardous waste facilities on the drawing.	
nial Reports (265.75)	
Has the owner/operator submitted biennial reports as required?	Yes No
nifested Waste Report (265.76)	
Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest?	Yes No N/A
If yes, has he submitted an unmanifested waste report to the Regional Administrator within 15 days?	Yes No
cate Types of Hazardous Waste Facilities	
Containers	
Tanks	
Surface Impoundments	
_ Waste Piles	
_ Land Treatment	
Landfill	
_ Incinerator	
_ Thermal Treatment	
_ Chemical, Physical and Biological Treatment	
Groundwater Monitoring Program	
	List plans and/or reports not made available for inspection. If reports are accessible and not made available or inspection, explain.  Did operator provide inspector with a drawing of the facility?  a. If yes, please indicate which are hazardous waste facilities on the drawing.  mial Reports (265.75)  Has the owner/operator submitted biennial reports as required?  mifested Waste Report (265.76)  Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest?  If yes, has he submitted an unmanifested waste report to the Regional Administrator within 15 days?  Cate Types of Hazardous Waste Facilities  Containers  Tanks  Surface Impoundments  Waste Piles  Land Treatment  Landfill  Incinerator  Thermal Treatment  Chemical, Physical and Biological Treatment

FACILITY NAME: BEP
EPA ID NUMBER: TX 1200939626

# CONTAINERS STORAGE CHECKLIST (SUBPART I - USE AND MANAGEMENT OF CONTAINERS 265.170)

1.	Does the facility store hazardous waste in containers?	No
	If no, do not complete this form.	
<u>Condi</u>	tion of Containers (265.171)	
2.	Are the containers in good condition? (check for leaks, corrosion, bulges, etc.)	Yes_No
	If no, explain in narrative and document with excephotograph.	ept for 1
3.	If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container?	No
Compa	tibility of Waste with Containers (265.172)	
4.	Is the waste compatible with the containers and/or its liner?	YesNo
	If no, explain in narrative.	
Manag	gement of Containers (265.173)	
5.	Are the stored containers closed?	<u>yes_X</u> no tin SAPs
	If no, explain in narrative. $ hgray 0$	tin SAPs
6.	Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak?	Yes_X_No
	If yes, explain in narrative.	•
Insp	ections (265.174)	
7.	Are each of the containers inspected at least weekly?	YesXNo
	If no, explain in the narrative the frequency of inspection.	

	FACILITY NAME:		
	EPA ID NUMBER:		
Speci	al Requirements for Ignitable or Reactive Waste (265.176)	·	
в.	Are containers holding ignitible or reactive wastes located at least 15 meters (50 feet) from the facility property line?	YesNo	
	If no, explain in narrative and document with photograph.		
Speci	al Requirements for Incompatible Wastes (265.177)		
·	Are incompatible wastes stored in the same containers?	Yes X	
	If yes, explain in narrative.		
10.	Are hazardous waste stored in an unwashed container that previously held an incompatible waste?	Yes_X_No	
l1.	Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance?		
	If no explain in namedian		

# Material Safety Data Sheet- Page 1 of 2 Bureau Of Engraving And Printing

dentity: Black Ink BK-3795-54, 57, 58, 59 (Reconstituted)

Date 7 / 97

### Section I - Chemical Product And Company Identification

Product: Black Ink BK-3795-54, 57, 58, 59

Manufacturer: Bureau Of Engraving And Printing

9000 Blue Mound Road Ft. Worth, TX, 76131

Prepared By: Office Of Human Resources-Safety and Occ. Health Division

(202) 874-3593

Date Prepared: 4/96

Hazard Ratings: Health - 1 (slight)

Flammability - 1 (slight) Reactivity - 0 (Minimal) APPROVED FOR USE BY THE

SAFETY & HEALTH OFFICE MSDS #: \_\_\_\_\_

DATE REVIEWED:

REVIEWED 8Y: \_\_\_\_\_

#### Section II - Composition/Ingradient Information

Component Name with Hazardous chemical, Percent, CAS #			•	0-7		
		% Component In Ink	% Hazardous Chemical In Ink	Occupational Exposure Limits		
1	Prewipe Black Ink (SICPA I-287)	75 - 85%	75 - 85%	NA		
2	. Low Viscosity Alkyd	0 - 4 %	0 - 4 %	N/A		
3.	. Cdorlesa Mineral Spirits	0 - 2 %	0-2%	100 ppm recommended as PEL/TWA		

#### Section III - Health Hazard Data

Routes of Entry: Inhalation? Yes. Skin/eye? Yes. Ingestion? Yes.

Health Hazards: Skin contact may cause imitation or dermatitis.

Eye contact may cause tearing, burning or Imitation.

Excessive inhalation of vapors or mists may cause local limitation, headache, dizziness, drewsiness, nausea, giddiness, pneumonia, central nervous system depression.

Ingestion may cause vomiting.

Carcinogenicity;

NTP? N/E

IARC Monographs? N/E

OSHA Regulated? N/E

Inhalation: Remove to fresh air, if breathing is difficult, get medical attention.

Signs & Symptoms of Exposure: Skin/eye irritation, headache, drowsiness, dizziness, nausea, central nervous system depression, giddiness.

Medical Conditions Generally Aggravated by Exposure: Pre-existing eye and skin disorders. Emergency & First Ald Procedures:

Eyes: Flush with water for 15 minutes; if imitation develops, get medical attention. Skin: Wash with scap and water, if imitation develops, get medical attention.

## Material Safety Data Sheet-Page 2 of 2

Bureau Of Engraving And Printing Black Ink BK-3795-54, 57, 58, 59 Identity:

Date 7 / 97

#### Section IV - Fire and Explosion Hazard Data

Flash Point

N/E

Lower Flammable Limit:

NÆ

Upper Flammable Umit

WE

Extinguishing Media:

Foam, CO2, dry chemical

Special Fire Fighting Procedure: Use self-contained breathing apparatus to protect against potentially

harmful and/or imitating furnes.

Unusual Fire & Explosion Hazards: Protect drums from exposure to extreme heat

NE - Not Established

#### Section V - Precautions for Safe Handling and Use

Steps to Be Taken in Case Material is Released or Spilled: Collect into suitable container for appropriate disposal. Use nitrile gloves and apron to avoid skin contact.

Waste Disposal Method: Dispose of in accordance with applicable federal and local environmental control regulations.

Precautions to Be Taken in Handling and Storing: Use nitrile gloves and apron to avoid skin contact. Keep container covered when not in use. Avoid high temperature and direct sunlight,

Other Prac⊒ubons: None.

#### Section VI - Control Measures

Ventilation: Use adequate ventilation to avoid build-up of vacors/mists.

Respiratory Protection: Previous air sampling indicates that ventilation is adequate in maintaining employee exposure to ink components below permissible exposure limits. If necessary for comfort purposes, use air purifying respirator equipped with organic-vapor cartridges.

Protective Gloves: Nitrile gloves.

Eye protection: Goggles, safety glasses, full-face shields

Other Protective Clothing or Equipment: Disposable lab coats, aprons, long sleeves, coveralis.

Work/Hygienic Practices: Avoid skin/eye contact and contamination of clothing. Wash hands thoroughly with soap and water after handling ink and before leaving work area. Launder contaminated clothing before reuse. Do not eat, drink, or smoke in work area.

#### ction VII - Physical/Chemical Characteristics

Bailing Point NE Vapor Pressure: N/E

Specific Gravity:. N/E Vacor Density: N/E

Solubility in water, N/E

pH: N/E

Physical State/Odor: Black paste/

Evaporation Rate: N/E

hydrocarbon oder. % volatile by volume: N/E

NE - Not Established

Meiting Point N/E

#### Section VIII - Reactivity Data

Stability: Stable.

Conditions to Avoid: Extreme heat, high pressure.

Incompatibility (Materials to Avoid): Strong exidizing and reducing chemicals.

Hazardous Decomposition Byproducts: CO2, CO

Hazardous Polymerization: Will not occur

END OF MSDS

FACIL	ITY N	IAME:	BE	<u> </u>		
EPA I	אטא ס	BER:	X12	000	1394	26

## RCRA GENERATORS CHECKLIST SUPPLEMENT

### Personnel Training (265.16)

1.	Have progr	facili am of	ty personnel successfully completed a classroom or on-the-job training?	Yeв_ <u>X</u> No
	a.	Does instr	the training program include uctions in the following:	
only train	iing	(1)	procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment?	YesNo
Nas 8hr	7	(2)	key parameters for automatic waste feed cut-off systems?	Yes No
refresher	· · · · )	(3)	operation of communication or alarm systems?	Yes No
do not kr Contents 0.	_	(4)	response to fires, explosions and groundwater contamination incidents?	Yes No
training	·	(5)	shutdown of operations?	YesNo
<i>)</i>		(6)	general hazardous waste management procedures?	YesNo
	b.	Is the	e program directed by a person ed in hazardous waste management dures?	YesNo
	c.	Have preview	personnel completed annual training	Yes No
	d.	Does t	the owner/operator maintain the wing documents:	7
•		(1)	Job title, job description and name of employee for each position at the facility related to hazardous waste management?	Yes_X\no
		(2)	Written description of the type and amount of both introductory and continuing training?	Yes XNo
:		(3)	Written documentation that the training has been completed by facility personnel?	Yes_X_No

			EPA ID NUMBER:		
Prepa	redness	and P	revention (265.30)		
1.	contar	ninatio	dence of fire, explosion or n of the environment? (265.31 and operation of facility)	YesNo	
If ye	s, use	narrat	ive explanations sheet to explain.		
2.	Is the		ity equipped with (265.32 - Required		
	a.	Intern	al communications or alarm system	XYesNo	
	b.		one or two-way radio to call emergency se personnel	XyesNo	
	·c.	equipm	le fire extinguishers, fire control ent spill control equipment and amination equipment	XyesNo	
		1.	Is this equipment tested to assure its proper operation?		
	d.		of adequate volume for hoses, clers or water spray system	X_YesNo	
		1.	Describe source of water		
		2.	Indicate flow rate and/or pressure and storage capacity, if available.		-
3.	unob.	structe	fficient aisle space to allow d movement of personnel and emergency (265.35-Required Aisle Space)	No	
4.	loca char faci and pers road	l autho acteris lity, p associa onnel w s insid	er/operator made arrangements with the rities to familiarize them with tics of the facility? (layout of roperties of hazardous waste handled ted hazards, places where facility rould normally be working, entrances to be facility, possible evacuation routes.) arrangements with local authorities)	YesNo	
		o, has ingement	the owner/operator attempted to make suc	h Yes No	
	TI	INDVL	n Fire Dept. does annual to		
GEN 2	SUPPLE		of facility.	REVISIONMAY 1	1992
	ha	we a	imbulance service availal	ole	

		FACILITY NAME	·
		EPA ID NUMBER	
5.		e that more than one police or fire might respond, is there a designated thority? (265.37 - Arrangements with orities)	YевNо ∧
	If yes, in	dicate primary authority:	
	a. Is t	he fire department a city or volunteer department?	
6.		wner/operator have phone numbers or and with State emergency response teams, response contractors and equipment	Xyes No
	Are they r coordinato authoritie	eadily available to the emergency r? (265.37 - Arrangements with local s)	YesNo
7.	waste hand result from facility?	ner/operator arranged to familiarize itals with the properties of hazardous led and types of injuries that could m fires, explosions, or releases at the	
	If no, has this? (265 authorities	the owner/operator attempted to do .37 - Arrangements with local	Yes_ <u>X</u> No
Con	tingency Plan	and Emergency Procedures (265.50) (	
1.	Does the fa	acility have a contingency plan? ntent of Contingency Plan)	No
	a. If ye	es, does it contain:	
	1.	actions to be taken in response to emergencies?	
•	2.	description of arrangements with police, fire and hospital officials?	Yes_X_No
	3.	list of names, addresses, phone numbers of persons qualified to act as emergency coordinator?	XesNo
	4.	list, including the location and physical description of all emergency equipment?	Yes_XNo
GEN 3	SUPPLEMENT		REVISIONMAY 1992

		<del></del>
	EPA ID NUMBER:_	Management of the second
	5. evacuation plan for facility personnel including signals, primary and alternate routes?	
2.	Is a copy of the contingency plan maintained at the facility? (255.53 - Copies of contingency plan)	XyesNo
3.	Has a copy been supplied to the local police, fire depts., and hospitals? (265.53 - Copies of contingency plan)	No
4.	Has the contingency plan been updated and amended as necessary?	Yes_X_No
5.	Is the plan a revised SPCC Plan? (265.52 - Content of contingency plan)	Yes_X_No
6.	Is there an emergency coordinator on-site or within short driving distance of the plant at all times?	No
	If yes, list primary emergency coordinator:	
		•

most of contingency plan is from a 126/94.

The chemical emergency part of plan has been updated as of 5/1/98.

#### **ATTACHMENTS**

- A. BEP Annual Waste Summary
- B. RCRA Checklists
- C. MSDSs for the Inks and the Solvents used at BEP
- D. Hazardous Waste Manifests
- E. BEP's List of Wastes and Codes
- F. BEP Contingency Plan





#### DEPARTMENT OF THE TREASURY

## BUREAU OF ENGRAVING AND PRINTING

Fort Worth, Texas 76131

January 22, 1998

Waste Evaluation Section/MC-129
Texas Natural Resources Conservation Commission
12100 Park 35 Circle
Austin, Texas 78753

The Bureau of Engraving and Printing's Annual Waste Summary for the Western Currency Facility at 9000 Blue Mound Road, Fort Worth, Texas is enclosed.

If you have any questions concerning these reports, please direct them to Colleen McKinney at (817),847-3820.

oniterary,

D. Leon Griffin, Manager Technical Support Division

WASTE EVALUATION SECTION
MC 128
MC 12

TELEPHONE: (512) 239-6832 Department of the Treasury 9000 Blue Mound Road Leon Griffin

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Your
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FOR DATA YEAR: 1997

Your SOLID WASTE REGISTRATION NUMBER:

NO REPORT REQUIRED

T,X,1,2,0,0,9,3,9,6,2,1 G 1 Report for: 19 97 38907 Your EPA ID #

{See 30 TAC 335.9(a)(3); also see instructions}

SUPPLEMENTAL SUMMARY SUMMARY STATUS REVISED SUMMARY

**ORIGINAL SUMMARY** 

817-847-3887

Fort Worth, TX 76131-3304

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT
TO BEPARET WASTERNATER SEE INSCREDITION IN DAILS IN PASSES.

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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Colleen McKinney

Preparer (PRINT NAME)

D. Leon Griffin

Authorized Agent (PRINT NAME LPS Form TNRCC - 0436-A (Rev. 10-10-97)

-15-98

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT. TO REPORT WASTEWATER, SEE INSTRUCTION BOOKLET RG-151. 38907 **SUMMARY STATUS** Studge from electroplating waste liquid treatment syste. Your SOLID WASTE REGISTRATION NUMBER: REVISED SUMMARY Corrosive liquid from printing rinse collection pit in WASTE DESCRIPTION WASTE DESCRIPTION {See 30 TAC 335.9(a)(3); also see instructions } **ANNUAL WASTE SUMMARY** COMMENTS COMMENTS FOR DATA YEAR: 1997 NO REPORT REQUIRED **ORIGINAL SUMMARY** 7 ~ <u>م</u> ო 4 RECEIVER'S EPA ID# RECEIVER'S EPA ID# 61 9 0 0 0 Q N N D 0 0 0 EPA HAZARDOUS EPA HAZARDOUS EPA HAZARDOUS WASTE NO. WASTE NO. WASTE NO. EPA HAZARDOUS WASTE NO. T Ţ EPA HAZARDOUS WASTE NO. 7 0 0 4 7 0 4 0 FACELITY NUMBER FACILITY NUMBER 817-847-3887 0 TELEPHONE: (512) 239-6832 N EPA HAZARDOUS EPA HAZARDOUS WASTE NO. D 0 0 8 WASTE EVALUATION SECTION
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SUPPLEMENTAL SUMMARY

G 1 Report for: 19 97

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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Colleen McKinnev		1/15/98
Preparer (PRINT NAME)	Supplying of Preparer	Date
D. Leon Griffin	SO S	シケイナー
Authorized Agent (PRINT NAME)	Signature of Authorized Agent	Date t
LPS Form TNRCC - 0436-A (Rev. 10-10-97)	h A	

Page 2 of 19

TELEPHONE: (512) 239-6832 WASTE EVALUATION SECTION
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Fort Worth, TX 76131-3304 817-847-3887 Department of the Treasury 9000 Blue Mound Road Leon Griffin

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FOR DATA YEAR: 1997

(See 30 TAC 335.9(a)(3); also see instructions } NO REPORT REQUIRED

38907 Your SOLID WASTE REGISTRATION NUMBER:

T X 1,2,0,0,9,3,9,6,2,1 G 1 Report for: 19 97 Your EPA ID#

SUPPLEMENTAL SUMMARY **SUMMARY STATUS** REVISED SUMMARY **ORIGINAL SUMMARY** 

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT. TO REPORT WASTEWATER, SEE INSTRUCTION BOOKLET RG-151.

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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Coepe JM/M	; Signature of Preparer
Colleen McKinney	Preparer (PRINT NAME)

-15-98

Authorized Agent (PRINT NAME) LPS Form TNRCC: 0438-A (Rev. 10-10-97)

D. Leon Griffin

WASTE EVALUATION SECTION
MC 128
MC 12

TELEPHONE: (512) 239-6832

Department of the Treasury 9000 Blue Mound Road Leon Griffin

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Your SOLID WASTE REGISTRATION NUMBER: 1997 FOR DATA YEAR:

SUMMARY STATUS {See 30 TAC 335.9(a)(3); also see instructions} NO REPORT REQUIRED

G 1 Report for: 19 97 38907

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Q രു SUPPLEMENTAL SUMMARY

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT. TO REPORT WASTEWATER SEE INSTRICTION ROOKLET RC-151.

REVISED SUMMARY

**ORIGINAL SUMMARY** 

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Fort Worth, TX 76131-3304

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Preparer (PRINT NAME) Colleen McKinney D. Leon Griffin

-15-98

TELEPHONE: (512) 239-6832 WASTE EVALUATION SECTION
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817-847-3887 Department of the Treasury Fort Worth, TX 76131-3304 9000 Blue Mound Road Leon Griffin

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G 1 Report for: 19 97 T,X,1,2,0,0,9 Your EPA ID# Your SOLID WASTE REGISTRATION NUMBER:

{See 30 TAC 335.9(a)(3); also see instructions} NO REPORT REQUIRED FOR DATA YEAR:

ORIGINAL SUMMARY

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SUMMARY STATUS

SUPPLEMENTAL SUMMARY **REVISED SUMMARY** 

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT TO REPORT WASTEWATER. SEE INSTRICTION BOOKLET RG-151.

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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Calabin Walking	Signature of Plepprey	N Car JAA	/ Signature of Authorized Agent
. Colleen McKinney	Preparer (PRINT NAME)	D. Leon Griffin	Authorized Agent (PRINT NAME)

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LPS Form TNRCC - 0436-A (Rev. 10-10-97)

Authorized Agent (PRINT NAME)

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817-847-3887 Fort Worth, TX 76131-3304 Department of the Treasury 9000 Blue Mound Road Leon Griffin

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FOR DATA YEAR: 1997

{See 30 TAC 335.9(a)(3); also see instructions} NO REPORT REQUIRED

38907 Your SOLID WASTE REGISTRATION NUMBER:

G 1 Report for: 19 97

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SUPPLEMENTAL SUMMARY SUMMARY STATUS REVISED SUMMARY **ORIGINAL SUMMARY** 

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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Colleen McKinney
Preparer, (PRINT NAME).

Authorized Agent (PRINT NAME) D. Leon Griffin

LPS Form TNRCC - 0436-A (Rev. 10-10-97)

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Page 6 of 19

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT. TO REPORT WASTEWATER, SEE INSTRUCTION BOOKLET RG-151. SUPPLEMENTAL SUMMARY T, X, 1, 2,0,0,9,3,9,6,2,1 G 1 Report for: 19 97 **TOTAL QUANTITY GENERATED** TOTAL QUANTITY GENERATED 38907 Your EPA ID # **SUMMARY STATUS** Drained oil filters from equipment and vessel maintenan Your SOLID WASTE REGISTRATION NUMBER: REVISED SUMMARY Waste nickel solids. Nickel plated printing plates are WASTE DESCRIPTION WASTE DESCRIPTION (See 30 TAC 335.9(a)(3); also see instructions } **ANNUAL WASTE SUMMARY** COMMENTS COMMENTS 1997 NO REPORT REQUIRED **ORIGINAL SUMMARY** FOR DATA YEAR: N ന N D 0 0 0 6 1 4 RECEIVER'S EPA ID# RECEIVER'S EPA ID# EPA HAZARDOUS EPA HAZARDOUS WASTE NO. EPA HAZARDOUS WASTE NO. EPA HAZARDOUS WASTE NO. 0 0 4 7 FACILITY FACILITY NUMBER 817-847-3887 TELEPHONE: (512) 239-6832 EPA MAZARDOUS EPA HAZARDOUS WASTE NO. WASTE NO. EPA HAZARDOUS WASTE NO. NG 129
INDUSTRIAL AND HAZARDOUS WASTE DIVISION
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
F.O. BOX 13087
AUSTIN, TEXAS 78711-3087
TELEPHONI M 1 32 SYSTEM TYPE CODE SYSTEM TYPE CODE EPA HAZARDOUS WASTE NO. Department of the Treasury Fort Worth, TX 76131-3304 6 GNITS Ωŧ 9000 Blue Mound Road 00 WASTE EVALUATION SECTION **QUANTITY HANDLED QUANTITY HANDLED** ω -00-14307-1-Leon Griffin TEXAS WASTE TEXAS WASTE CODE 00,153,101,

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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

is true, accurate, and complete.	1-15-98	Date	1-77-06	Date V	
believe that the submitted information	Makamen	ighature of Preparer	5000 C	lure of Authorized Agent	
obtaining the information, I is	Calphon Y			∫ ( Signa	
inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.	Colleen McKinney	Preparer (PRINT NAME)	D. Leon Griffin	Authorized Agent (PRINT NAME)	

LPS Form TNRCC - 0436-A (Rev. 10-10-97)

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT TO REPORT WASTEWATER, SEE INSTRUCTION BOOKLET RG-151. SUPPLEMENTAL SUMMARY FPA ID# TX112,0,0,9,3,9,6,2,1 *TOTAL QUANTITY GENERATED* TOTAL QUANTITY GENERATED 38907 Deschrome waste from the stripping of chromium from pri-Waste printing rinse from bottom of waste treatment tan. **SUMMARY STATUS** Your SOLID WASTE REGISTRATION NUMBER: REVISED SUMMARY WASTE DESCRIPTION WASTE DESCRIPTION {See 30 TAC 335.9(a)(3); also see instructions } **ANNUAL WASTE SUMMARY** COMMENTS COMMENTS 1997 NO REPORT REQUIRED **ORIGINAL SUMMARY** FOR DATA YEAR: T N D 000014321 TN D 00 061432 RECEIVER'S EPA ID# RECEIVER'S EPA ID# EPA HAZARDOUS EPA HAZARDOUS
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INDISTRIAL AND HAZARDOUS WASTE DIVISION
INDISTRIAL AND HAZARDOUS WASTE DIVISION
P.O. BOX 13087
AUSTIN, TEXAS 78711-3087
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Report for: 19 97

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Fort Worth, TX 76131-3304 817-847-3887 TELEPHONE: (512) 239-6832 Department of the Treasury 9000 Blue Mound Road Leon Griffin

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FOR DATA YEAR: 1997

NO REPORT REQUIRED

Your SOLID WASTE REGISTRATION NUMBER:

38907,

G 1 Report for: 19 97

SUPPLEMENTAL SUMMARY 6,2,1 დ დ\_ 0 Your EPA 1D # 1 1 2 0 0 SUMMARY STATUS REVISED SUMMARY (See 30 TAC 335.9(a)(3); also see instructions }

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT. TO REPORT WASTEWATER, SEE INSTRUCTION BOOKLET RG-151.

**ORIGINAL SUMMARY** 

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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

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McKinney	Preparer
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LPS Form TNRCC - 0436-A (Rev. 10-10-97)

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WASTE EVALUATION SECTION
MC12N
INCLISTRIAL AND HAZARDOUS WASTE DIVISION
TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
P.O. BOX 13087
TEXAS 78711-3087
TELEPHONE

9000 Blue Mound Road Fort Worth, TX 76131-3304 817-847-3887 TELEPHONE: (512) 239-6832 Department of the Treasury Leon Griffin

ANNITAL WASTE CHAMMADY		
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FOR DATA YEAR: 1997		
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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based e, and complete.

		LPS Form TNRCC - 0436-A (Rev. 10-10-97)
Date	Signature of Authorized Agent	Authorized Agent (PRINT NAME)
16-77-1	S Solden	D. Leon Griffin
Date	Signature of Preparer	Preparer (PRINT NAME)
1-15-98	Colder WM min	. Colleen McKinney
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Page\_10 of 19

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT TO REPORT WASTEWATER, SEE INSTRUCTION BOOKLET RG-151. SUPPLEMENTAL SUMMARY 9,3,9,6,2,1 *TOTAL QUANTITY GENERATED* **TOTAL QUANTITY GENERATED** Page\_//\_ of //  $T_{X,1,2,0,0}$ EPA 10 # I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. Depleted mercury containing batteries from plant use. H. Depleted nickel-cadmism batteries from plant use. Hazar **SUMMARY STATUS** REVISED SUMMARY ーレアーの -15-98 Date WASTE DESCRIPTION WASTE DESCRIPTION (See 30 TAC 335.9(a)(3); also see instructions } COMMENTS COMMENTS NO REPORT REQUIRED **ORIGINAL SUMMARY** FOR DATA YEAR: RECEIVER'S EPA ID# RECEIVEN'S EPA ID# EPA HAZARDOUS EPA HAZARDOUS EPA HAZARDOUS WASTE NO. WASTE NO. WASTE NO. EPA HAZARDOUS WASTE NO. EPA HAZARDOUS WASTE NO. FACILITY NUMBER FACILITY NUMBER 817-847-3887 TELEPHONE: (512) 239-6832 EPA HAZARDOUS WASTE NO. MC 129
INDUSTRIAL AND HAZARDOUS WASTE DIVISION
INDUSTRIAL AND HAZARDOUS WASTE DIVISION
FEXAS NATURAL RESOURCE CONSERVATION COMMISSION
P.O. BOX 13087
AUSTIN, TEXAS 78711-3087
TELEPHONE SYSTEM TYPE CODE SYSTEM TYPE CODE Preparer (PRINT NAME) Fort Worth, TX 76131-3304 EPA HAZARDOUS WASTE NO. Department of the Treasury 67 6 Σ UNITS Colleen McKinney D. Leon Griffin 99 9000 Blue Mound Road QUANTITY HANDLED **QUANTITY HANDLED** -0025309H -0024399H-Leon Griffin TEXAS WASTE CODE TEXAS WASTE

Authorized Agent (PRINT NAME)

LPS Form TNRCC - 0436-A (Rev. 10-10-97)

UNITS

Report for: 19 97

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38907

Your SOLID WASTE REGISTRATION NUMBER:

**ANNUAL WASTE SUMMARY** 

WASTE EVALUATION SECTION

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT BE SURE THE INFORMATION IS CORRECT. TO REPORT WASTEWATER, SEE INSTRUCTION BOOKLET RG-151. SUPPLEMENTAL SUMMARY ر درآ Report for: 19 97 ر 0 0 **TOTAL QUANTITY GENERATED TOTAL QUANTITY GENERATED** ന 600 ญั <u>G</u> T, X, 1, Your EPA ID# 38907 SUMMARY STATUS YOUR SOLID WASTE
REGISTRATION NUMBER: Depleted and drained lead acid batteries from plant use REVISED SUMMARY Spill cleanup from sulfuric acid spills from battery ch WASTE DESCRIPTION WASTE DESCRIPTION (See 30 TAC 335.9(a)(3); also see instructions } **ANNUAL WASTE SUMMARY** COMMENTS COMMENTS FOR DATA YEAR: 1997 NO REPORT REQUIRED **ORIGINAL SUMMARY** RECEIVER'S EPA ID# RECEIVER'S EPA ID# EPA HAZARDOUS EPA HAZARDOUS WASTE NO. WASTE NO. EPA HAZARDOUS WASTE NO. × EPA HAZARDOUS WASTE NO. FACILITY FACILITY NUMBER Fort Worth, TX 76131-3304 817-847-3887 TELEPHONE: (512) 239-6832 EPA HAZARDOUS EPA HAZARDOUS WASTE NO. WASTE NO. EPA HAZARDOUS EPA HAZARDOUS WASTE NO. 33 2 2 2 WASTE EVALUATION SECTION
MC12A
MDUSTRIAL AND HAZARDOUS WASTE DIVISION
TEKAS NATURAL RESOURCE CONSERVATION COMMISSION
P.O. BOX 13067
TEXAS 78711-3087
TELEPHONE SYSTEM TYPE CODE SYSTEM TYPE CODE Department of the Treasury 67 6 29 67 Σ UNITS UNITS 8 9000 Blue Mound Road **QUANTITY HANDLED QUANTITY HANDLED** Leon Griffin TEXAS WASTE -0027309H-TEXAS WASTE CODE -0026309H

UNITS

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

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LPS Form TNRCC - 0438-A (Rev. 10-10-97)		

Page 17. of 19

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817-847-3887 Department of the Treasury Fort. Worth, TX 76131-3304 9000 Blue Mound Road Leon Griffin

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Your SOLID WASTE REGISTRATION NUMBER: {See 30 TAC 335.9(a)(3); also see instructions} SUMMARY STATUS

**REVISED SUMMARY** 

**ORIGINAL SUMMARY** 

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SUPPLEMENTAL SUMMARY

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT. TO REPORT WASTEWATER, SEE INSTRUCTION BOOKLET RG-151.

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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

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McKinney	Preparer (PRINT NAME)
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Authorized Agent (PRINT NAME) LPS Form TNRCC - 0436-A (Rev. 10-10-97)

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Fort Worth, TX 76131-3304 817-847-3887 Department of the Treasury 9000 Blue Mound Road Leon Griffin

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{See 30 TAC 335.9(a)(3); also see instructions} FOR DATA YEAR: 1997 NO REPORT REQUIRED

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G 1 Report for: 19 97 Vour EPA ID# 1 2, 0, 0, 9, 3, 9, 6, 2, 3 SUPPLEMENTAL SUMMARY

**SUMMARY STATUS REVISED SUMMARY** 

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT.  TO REPORT WASTEWATER, SEE INSTRUCTION BOOKLET RG-151.
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**ORIGINAL SUMMARY** 

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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

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LPS Form TNRCC - 0438-A (Rev. 10-10-97)

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REFORT. BE SURE THE INFORMATION IS CORRECT TO REPORT WASTEWATER, SEE INSTRUCTION BOOKLET RG-151. 38907 **SUMMARY STATUS** Your SOLID WASTE REGISTRATION NUMBER: REVISED SUMMARY "RCRA" empty steel/plastic containers for disposal. WASTE DESCRIPTION WASTE DESCRIPTION {See 30 TAC 335.9(a)(3); also see instructions} **ANNUAL WASTE SUMMARY** COMMENTS COMMENTS FOR DATA YEAR: 1997 NO REPORT REQUIRED **ORIGINAL SUMMARY** RECEIVER'S EPA ID# RECEIVER'S EPA ID# EPA HAZARDOUS EPA HAZARDOUS EPA HAZARDOUS WASTE NO. WASTE NO. WASTE NO. EPA HAZARDOUS WASTE NO. × EPA HAZARDOUS WASTE NO. FACILITY NUMBER FACILITY NUMBER 817-847-3887 TELEPHONE: (512) 239-6832 EPA HAZARDOUS EPA HAZARDOUS WASTE NO. WASTE NO. WASTE EVALUATION SECTION
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MC 12 SYSTEM TYPE CODE SYSTEM TYPE CODE Fort Worth, TX 76131-3304 Department of the Treasury 9000 Blue Mound Road 99 **QUANTITY HANDLED GUANTITY HANDLED** -00,32,308-1,---0033404H Leon Griffin TEXAS WASTE TEXAS WASTE CODE

SUPPLEMENTAL SUMMARY

*TOTAL QUANTITY GENERATED* 

G 1 Report for: 19 97

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Your EPA ID#

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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

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. Colleen McKinney	Preparer (PRINT NAME)	D. Leon Griffin	Authorized Agent (PRINT NAME)

LPS Form TNRCC - 0436-A (Rev. 10-10-97)

Page 15 of 19

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817-847-3887 TELEPHONE: (512) 239-6832 Fort Worth, TX 76131-3304 Department of the Treasury 9000 Blue Mound Road Leon Griffin

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FOR DATA YEAR: 1997 NO REPORT REQUIRED

{See 30 TAC 335.9(a)(3); also see instructions}

Your SOLID WASTE REGISTRATION NUMBER:

38907

G 1 Report for: 19 87

FPA ID # T, X, 1, 2, 0, 0, 9, 3, 9, 6, 2, 1 **SUMMARY STATUS**  SUPPLEMENTAL SUMMARY

REVISED SUMMARY

**ORIGINAL SUMMARY** 

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT. TO REPORT WASTEWATER, SEE INSTRUCTION BOOKLET RG-151.

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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

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D. Leon Griffin

Authorized Agent (PRINT NAME LPS Form TNRCC - 0436-A (Rev. 10-10-97)

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1997 FOR DATA YEAR:

(See 30 TAC 335.9(a)(3); also see instructions }

NO REPORT REQUIRED

Your SOLID WASTE REGISTRATION NUMBER:

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YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT TO REPORT WASTEWATER, SEE INSTRUCTION BOOKLET RG-151. SUPPLEMENTAL SUMMARY REVISED SUMMARY ORIGINAL SUMMARY

SUMMARY STATUS

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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

n McKinney	Preparer (PRINT NAME)
Colleen	

D. Leon Griffin

Authorized Agent (PRINT NAME) LPS Form TNRCC - 0436-A (Rev. 10-10-97)

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EPA HAZARDOUS. EPA HAZARDOUS WASTE NO. WASTE NO. × ß 00 0 0 4 FACILITY 817-847-3887 TELEPHONE: (512) 239-6832 EPA HAZARDOUS EPA HAZARDOUS WASTE NO. WASTE NO. INDUSTRIAL AND HAZARDOUS WASTE DIVISION TEXAS NATURAL RESOURCE CONSERVATION COMMISSION P.O. BOX 13887 18711-3087 TELEPHONI SYSTEM TYPE CODE 4 M Department of the Treasury Fort Worth, TX 76131-3304 67 6 Ξ UNITS Ωı 교명 9000 Blue Mound Road 0 0 WASTE EVALUATION SECTION MC 129 4 QUANTITY HANDLED m 2 <del>ග</del> Leon Griffin TEXAS WASTE CODE 00,403,191 3 ო

SUPPLEMENTAL SUMMARY <u>T.X.1.20,0,9,3,9,6,271</u> Report for:  $19 \mid 9/7$ <u>ප</u> Your EPA ID# 38907 **SUMMARY STATUS** Your SOLID WASTE REGISTRATION NUMBER: REVISED SUMMARY {See 30 TAC 335.9(a)(3); also see instructions} ANNUAL WASTE SUMMARY FOR DATA YEAR: 1997 NO REPORT REQUIRED **ORIGINAL SUMMARY** 

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT. TO REPORT WASTEWATER, SEE INSTRUCTION BOOKLET RG-151. <u>م</u> ۾ ᅀ 3 3 9 1 5 4 0 0 *TOTAL QUANTITY GENERATED* **FOTAL QUANTITY GENERATED** 0 ന 4 0 C) ANDFILL NDFIL ⋖ ᄀ Waste sludge from coagulation and flocculation of press Maste intaglio ink from printing presses producting U.S. T CITY н U OKILAHOMA AHOMA WASTE DESCRIPTION WASTE DESCRIPTION COMMENTS COMMENTS N L 0 RECEIVER'S EPA ID# RECEIVER'S EPA ID# EPA HAZARDOUS EPA HAZARDOUS WASTE NO. 040 0 FACILITY NUMBER 0 0 EPA HAZARDOUS EPA HAZARDOUS WASTE NO. WASTE NO. 32 SYSTEM TYPE CODE 4 IM 1 Z J 67 щ D1 8 g 8  $\circ$ --<u>ω</u> QUANTITY HANDLED 3 ~ TEXAS WASTE CODE 00414091 0 7

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. Colleen McKinney

1-15-98

Page 18 of 19

Authorized Agent (PRINT NAME)

D. Leon Griffin

Preparer (PRINT NAME)

LPS Form TNRCC - 0436-A (Rev. 10-10-97)

NO REPORT REQUIRED **ORIGINAL SUMMARY** FOR DATA YEAR: RECEIVER'S EPA ID# RECEIVER'S EPA ID# EPA HAZARDOUS WASTE NO. EPA HAZARDOUS WASTE NO. × EPA HAZARDOUS WASTE NO. EPA HAZARDOUS WASTE NO. FACILITY FACILITY 817-847-3887 TELEPHONE: (512) 239-6832 EPA HAZARDOUS EPA HAZARDOUS WASTE NO. EPA HAZARDOUS WASTE NO. MC 128
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TEXAS NATURAL RESOURCE CONSERVATION COMMISSION
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**ANNUAL WASTE SUMMARY** 

1997

38907, Your SOLID WASTE REGISTRATION NUMBER:

G 1 Report for: 19 97 <u>ن</u> ດ) ັ ന ത് 00 S T X T

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Your EPA ID# **SUMMARY STATUS** (See 30 TAC 335.9(a)(3); also see instructions }

SUPPLEMENTAL SUMMARY REVISED SUMMARY

YOUR WASTE GENERATION FEE IS CALCULATED FROM THIS REPORT. BE SURE THE INFORMATION IS CORRECT. TO REPORT WASTEWATER, SEE INSTRUCTION BOOKLET RG-151.

TOTAL QUANTITY GENERATED Waste carbon cartridges enclosed in metal casings. Moun WASTE DESCRIPTION COMMENTS

UNITS *FOTAL QUANTITY GENERATED* WASTE DESCRIPTION COMMENTS 67 62 99

i certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Preparer (PRINT NAME) Colleen McKinney

Leon Griffin <u>.</u> LPS Form TNRCC - 0436-A (Rev. 10-10-97)

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Page 19 of 19